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September 3, 2020

VIA Electronic Filing

Hon. James B. Clark, III United States Magistrate Judge United States District Court District of New Jersey 50 Walnut Street MLK Building and US Courthouse Newark, NJ 07101

Re: One Journal Square Partners Urban Renewal Company, LLC, et al. v.

Jersey City Redevelopment Agency, et al.

Case No.: 2:18-cv-11148

Dear Magistrate Clark:

This firm represents the Jersey City Redevelopment Agency in connection with the above-referenced litigation. On behalf of all parties, we respectfully request that Your Honor extend the deadlines in the May 20, 2020 Pretrial Scheduling Order (the "Order"), as extended by the Court's August 7, 2020 order, by an additional thirty (30) days. Since our last correspondence, dated August 6, 2020, the parties have continued meaningful settlement discussions and expect to soon exchange draft settlement documents. The parties once again request this additional time to try to resolve this matter without having to incur a substantial expense in responding to discovery. The parties respectfully submit that this potential settlement represents good cause for such extension, particularly given the expense that would otherwise be incurred by public entities.

Thank you for your consideration of this request.

Respectfully submitted,

William W. Northgrave

WWN:gmm

cc: Victor A. Afanador, Esq. (via e-filing)
John A. Azzarello, Esq. (via e-filing)
Joseph B. Fiorenzo, Esq. (via e-filing)